

1 REMARKS

2 Status of the Claims

3 Claims 1-11 and 13-26 remain pending in the application, Claim 12 having been previously  
4 cancelled. No amendment is made in this response.

5 Claims Rejected Under 35 U.S.C. § 103(a)

6 In the interest of reducing the complexity of the issues for the Examiner to consider in this  
7 response, the following discussion focuses on independent Claims 1, 7, 11, and 23. The patentability  
8 of each remaining dependent claim is not necessarily separately addressed in detail. However,  
9 applicants' decision not to discuss the differences between the cited art and each dependent claim  
10 should not be considered as an admission that applicants concur with the Examiner's conclusion that  
11 these dependent claims are not patentable over the disclosure in the cited references. Similarly,  
12 applicants' decision not to discuss differences between the prior art and every claim element, or every  
13 comment made by the Examiner, should not be considered as an admission that applicants concur  
14 with the Examiner's interpretation and assertions regarding those claims. Indeed, applicants believe  
15 that all of the dependent claims patentably distinguish over the references cited. In any event, a  
16 specific traverse of the rejection of each dependent claim is not required, since dependent claims are  
17 patentable for at least the same reasons as the independent claims from which the dependent claims  
18 ultimately depend.

19 Discussion of the Rejection of Claims 1 - 6

20 The Examiner has rejected Claims 1-5 as being unpatentable under 35 U.S.C. § 103 over  
21 Microsoft Outlook 2000 (version 9.0.0.4527; copyrighted 1999, hereinafter referred to as "Outlook")  
22 in view of Thompson et al. (U.S. Patent Publication No 2001/0003183, hereinafter referred to as  
23 "Thompson"). The Examiner asserts that it would have been obvious to one of ordinary skill in the  
24 art to modify Outlook to include a Name as a unique identifier as taught by Thompson, providing the  
25 benefit of formulating information requests in complex query languages. The Examiner has also  
26 rejected Claim 6 as being unpatentable over Outlook in view of Thompson and further in view of  
27 Yahoo (Non Patent Literature, Nov. 9, 2000 and Sept 8, 1999). Applicants respectfully disagree with  
28 both of these rejections for the reasons discussed below.

29 With regard to independent Claim 1, the Examiner asserts that Outlook discloses applicants'  
30 first step that recites "identifying a string having a unique identifier associated with the string." In

1 addition, the Examiner asserts that although Outlook does not expressly teach a unique identifier,  
2 Thompson teaches that a name can be a unique identifier that is associated with a string. The  
3 Examiner cites items a and b of page 1 of Outlook, noting that the name in the query box is  
4 associated with a name in the list of Outlook, and the Examiner further cites paragraph 16 of  
5 Thompson. It appears that the Examiner is asserting that the string is the name in the list, e.g., "Sain,  
6 Gautam" is identified by the highlighting, and that this string has a unique identifier "sain" as shown  
7 by item b. Applicants respectfully disagree with this interpretation and conclusion. First, it is not  
8 apparent to applicants that one of ordinary skill would have been motivated to combine Outlook and  
9 Thompson. Although Thompson teaches that "in order to represent concepts in a computer system, a  
10 unique identifier or name is assigned to every concept of interest. For example, the concept  
11 Ibuprofen might have the unique identifier C020740" (Thompson, page 2), it is not apparent to  
12 applicants how the invention of Thompson that is directed towards generating a complex query  
13 request for a database, is related to a method for validating information in an electronic document.  
14 Furthermore, even if, *arguendo*, Thompson did provide one of ordinary skill the motivation to  
15 combine the references in the manner proposed by the Examiner, as is apparent from the names in the  
16 list, no unique identifier exists for the exemplary string. Specifically, the Examiner should note that  
17 the identifier "sain" is not unique, because "sain" is included in another string, "Saint-Surin,  
18 Jacques." Thus, two names in the list both have last names beginning with the letters "s," "a," "i,"  
19 and "n." And, in an even larger global address list, it is probable that more than two names in the list  
20 will begin with the letters "s," "a," "i," and "n."

21 Moreover, Outlook does not teach or suggest an equivalent of applicants' second, third, fourth  
22 and fifth steps, because a request for information related to a string comprising a name and which is  
23 associated with a unique identifier cannot occur in Outlook due the lack of a unique identifier being  
24 associated with the name. In the example noted above, it is not clear whether information associated  
25 with the name "Sain, Gauatm" or the name, "Saint-Surin, Jacques" is desired, since "sain" is not a  
26 unique identifier for either name. Accordingly, the rejection of independent Claim 1 under  
27 35 U.S.C. § 103(a) should be withdrawn because Outlook in view of Thompson neither teaches nor  
28 suggests all of the claim limitations of independent Claim 1.

29 Because dependent claims include all of the elements of the independent claim from which  
30 the dependent claims ultimately depend, dependent Claims 2-6 are patentable for at least the reasons

discussed above in regard to independent Claim 1. Accordingly, the rejection of dependent Claims 2-6 under 35 U.S.C. § 103(a) should be withdrawn.

Discussion of the Rejection of Claims 7 – 10

The Examiner has rejected Claims 7-10 as being unpatentable over Gehani et al. (U.S. Patent No 5,946,687, hereinafter referred to as “Gehani”). The Examiner has asserted that it would have been obvious to one of ordinary skill in the art at the time of the invention to interpret Gehani’s teachings of maps and yellow page information as reference material, providing the benefit of a personal information manager known by an address book, including name and an address that provides a user with maps and directions. However, significant differences exist between Gehani and applicants’ claimed invention because Gehani does not teach or suggest applicants’ second step that recites “determining that an identity of a user is relevant to the selected reference material” and does not teach or suggest applicants’ last step that recites “providing the selected reference material in a manner that is relevant to the identified user.”

With regard to independent Claim 7, the Examiner cites lines 20-25 of column 3 as disclosing applicants’ second step, because the Examiner asserts that a name is relevant to geographical information in the personal information manager. However, this portion of Gehani enables a user to keep track of information such as names, addresses, and telephone numbers of personal and business contacts (Gehani, column 3, lines 20-21) and thus, at most, teaches that the identity of a user’s *personal and business contacts* (as opposed to the user’s identity) are relevant to the selected reference material.

In addition, the Examiner cites line 21 and lines 37-45 of column 4 as disclosing last step in applicants’ Claim 7, because the Examiner asserts that geographical information is presented with MAP, weather or Yellow Pages into an appropriate request format. However, the meaning of “in a manner relevant to the identified user” means that *“the manner of providing the information is determined, in part, by the identity of the user requesting the information. For example, if a user requests a set of directions, the directions should begin from the user’s location. In this manner, directions to a common location provided for users originating at different locations are tailored to each user”* (see applicants’ specification, page 16, lines 14-20). In contrast, Gehani provides geographic information based on an address A of the contact in field 52 (Gehani, column 4, lines 46-48). Gehani does not provide geographic information based on the address of the identified

1 user. Accordingly, the rejection of independent Claim 7 under 35 U.S.C. § 103(a) should be  
2 withdrawn because Gehani neither teaches nor suggests all of the claim elements of independent  
3 Claim 7.

#### 4 Discussion of Dependent Claim 8

5 With regard to dependent Claim 8 that recites "...providing the set of directions so that the  
6 directions begin with the identified user's location," the Examiner cites lines 25-35 of column 5 of  
7 Gehani as disclosing this step since this means directions where the user is requested to supply the  
8 start address in order to get directions to an end." However, the start address does not begin with the  
9 identified user's address but only with a start address that the user enters. Thus, there is no teaching  
10 that the start address is the user's location. Accordingly, the rejection of dependent Claim 8 under  
11 35 U.S.C. § 103(a) should be withdrawn because Gehani neither teaches nor suggests all of the claim  
12 limitations of dependent Claim 8.

13 And because dependent claims are considered to include all of the elements of the  
14 independent claims from which the dependent claims depend, dependent Claims 8-10 are patentable  
15 for at least the reasons discussed above in regard to independent Claim 7. Accordingly, the rejection  
16 of dependent Claims 8-10 under 35 U.S.C. § 103(a) should be withdrawn.

#### 17 Discussion of Rejection of Claims 11, 13, 14, 18, 19, 21, and 22

18 The Examiner has rejected Claims 11, 13, 14, 18, 19, 21, and 22 as being unpatentable over  
19 Outlook in view of Gehani. With respect to Claim 11, the Examiner asserts that it would have been  
20 obvious to one of ordinary skill in the art at the time of the invention to modify Outlook to include  
21 maps and yellow pages information as reference material based on user requesting info on a location  
22 as taught by Gehani, providing the benefit of a personal information manager known by an address  
23 book including names and addresses that provides a user with maps, directions. The Examiner has  
24 also rejected Claims 15 and 16 as being unpatentable over Outlook, in view of Gehani, and further in  
25 view of Cconcepts' Wordworks (Non Patent Literature copyright May 1997, hereinafter referred to as  
26 "Wordworks"). The Examiner has rejected Claim 17 as being unpatentable over Outlook in view of  
27 Gehani, and further in view of Microsoft Word (Non Patent Literature, copyright 1999, hereinafter  
28 referred to as "MS-Word"). The Examiner has rejected Claim 20 as being unpatentable over  
29 Outlook, in view of Gehani, and further in view of Thompson.

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1 Applicants respectfully disagree with these rejections for the reasons discussed above in  
2 connection with Claim 1. Outlook does not teach or suggest an electronic document that comprises a  
3 string having a unique identifier associated with the string. Accordingly, the rejection of independent  
4 Claim 11 under 35 U.S.C. § 103(a) should be withdrawn because Outlook neither teaches nor  
5 suggests what is recited in independent Claim 11.

6 Because dependent claims are considered to include all of the elements of the independent  
7 claim from which the dependent claims depend, dependent Claims 13-22 are patentable for at least  
8 the reasons as independent Claim 11. Accordingly, the rejection of dependent Claims 13-22 under  
9 35 U.S.C. § 103(a) should be withdrawn.

10 Discussion of Rejection of Claims 23 - 24

11 The Examiner has rejected Claims 23-24 as being unpatentable over Thompson in view of  
12 Wordworks. The Examiner has asserted that it would have been obvious to one of ordinary skill in  
13 the art at the time of the invention to modify Thompson to include a definition of a word from the  
14 dictionary, where the definition is displayed in the user interface, as taught by Wordworks, providing  
15 the benefit of a simple but effective tool useful to serious users who produce a lot of text.

16 With regard to independent Claim 23, the Examiner asserts that Thompson discloses the  
17 first step of applicants' claim, which recites "in response to a selection of a dictionary control  
18 provided by the application program, displaying a dictionary interface on a display device,"  
19 because Thompson teaches a user interface to query for a keyword dictionary. Further, the  
20 Examiner cites Table 1 and paragraph 60. However, assuming, *arguendo*, that the graphical user  
21 interface is equivalent to applicants' dictionary interface, Thompson still does not teach or suggest  
22 that the user interface is displayed *in response to a selection of a dictionary control* or that the  
23 dictionary control is provided by the *application program*. Instead, it appears that the application  
24 program is the graphical user interface shown in Table 1, and that no separate dictionary control  
25 exists in Thompson. In other words, unlike applicants' claimed invention, wherein the user may be  
26 working with an electronic document in a word processing program and have the option of  
27 selecting the dictionary control in order to check the spelling or obtain the definition of a selected  
28 word, in Thompson, the user appears to always be working in the user graphical interface that  
29 provides the definition, since the application program and the user graphical interface are the same.  
30 Thus, the user never activates a dictionary control in order to obtain more information. As shown

1 in Table II, if the user needs more information about the word "cold," the user simply types this  
2 word on the screen of the graphical user interface. But, there is no teaching or suggestion in these  
3 cited references about activating a dictionary control in order to cause a screen to appear such that  
4 the word "cold" may be typed onto this screen.

5 The Examiner also asserts that Thompson, in view of Wordworks discloses the third, fifth,  
6 and sixth steps of applicants' claimed invention that recite "creating a request for a definition of the  
7 selected word," "accessing the dictionary file to obtain the definition of the selected word," and  
8 "providing the definition of the selected word so that the definition is displayed in the dictionary  
9 interface," respectively. In asserting that one of ordinary skill would be led to combine Wordworks  
10 with Thompson, the Examiner asserts that Wordworks produces a definition of a word from the  
11 dictionary and thus, it is an effective tool and a must for all serious users who produce a lot of text.  
12 However, recognizing that Wordworks is a useful application is not a sufficient reason for one of  
13 ordinary skill to be led to modify Thompson to include Wordworks. Thompson teaches that his  
14 invention is useful to access distributed, heterogeneous databases that do not have a single  
15 standardized vocabulary or structure (see Thompson, Abstract). There is no teaching or suggestion in  
16 Thompson or Wordworks that a user of distributed databases would care about producing text, and  
17 would thus benefit from including Wordworks in Thompson. Thus, there is really no motivation for  
18 the combination proposed by the Examiner. Accordingly, the rejection of independent Claim 23  
19 under 35 U.S.C. § 103(a) should be withdrawn because Thompson in view of Wordworks neither  
20 teach nor suggest all of the recitation of independent Claim 23.

21 Rejection of Dependent Claims 24, 25, and 26

22 The Examiner has rejected Claims 25-26 as being unpatentable over Thompson in view of  
23 Wordworks and further in view of MS-Word. However, Claims 25-26 and Claim 24 depend from  
24 independent Claim 23, which is patentable for the reasons discussed above. Because dependent  
25 claims include all of the elements of the independent claim from which the dependent claims depend,  
26 dependent Claims 24-26 are patentable for at least the reasons discussed above in regard to  
27 independent Claim 23. Accordingly, the rejection of dependent Claims 24-26 under  
28 35 U.S.C. § 103(a) should be withdrawn.

29 In view of the Remarks set forth above, it will be apparent that the claims in this application  
30 define a novel and non-obvious invention. The application is in condition for allowance and should

1 be passed to issue without further delay. Should any further questions remain, the Examiner is  
2 invited to telephone applicants' attorney at the number listed below.

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4 Respectfully submitted,

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